

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in The U.S.
DISTRICT COURT at Seattle, Washington.

December 22 20*09*
BRUCE RIFKIN, Clerk
By *H. Arent Zachary* Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

SEAN WILLIAM DOAK,
JAMES GREGORY CAMERON,
COLIN HUGH MARTIN,
ADAM CHRISTIAN J. SERRANO,

Defendants.

CR08-244RSL

SECOND SUPERSEDING
INDICTMENT



08-CR-00244-INDI

The Grand Jury charges that:

COUNT 1

(Conspiracy to Possess with the Intent to Distribute Controlled Substances)

Beginning at a time unknown but within the past five years and continuing through November 17, 2009, in Seattle within the Western District of Washington, and elsewhere, SEAN WILLIAM DOAK, JAMES GREGORY CAMERON, COLIN HUGH MARTIN, ADAM CHRISTIAN J. SERRANO and others, known and unknown, knowingly and intentionally did conspire to possess with the intent to distribute controlled substances, including marijuana, a substance controlled under Schedule I, Title 21, Schedule I; 3,4-Methylenedioxymethamphetamine, also known as MDMA or Ecstasy, a substance controlled under Schedule I, Title 21, United States Code, Section 812; and cocaine, a substance controlled under Schedule II, Title 21, United States Code, Section 812.

Manner and Means of the Conspiracy

It was part of the conspiracy that non-commercial helicopters were flown from Canada across the international border into Northwestern United States to deliver marijuana and 3,4- Methylenedioxymethamphetamine (MDMA) for distribution in the United States.

It was part of the conspiracy that those helicopters delivered the controlled substances from Canada to coconspirators who waited in the United States to receive the loads for distribution in the United States.

It was part of the conspiracy that coconspirators picked up loads of cocaine in the Southwestern United States and drove vehicles with the cocaine to designated helicopter landing sites in the United States near the international border.

It was part of the conspiracy that coconspirators loaded the cocaine onto the helicopters and pilots flew the helicopters back into Canada with cocaine for distribution in that country.

It was part of the conspiracy that coconspirators used encrypted Blackberry communication devices and satellite telephones to coordinate locations, deliveries, personnel and to confirm participants and actions. The coconspirators used monikers, often more than one, as their screen names and never used their true and legal names for sending or receiving Blackberry messages. They also used multiple Blackberry devices and sometimes shared devices, so that the use of screen names assumed significance to protect communications and to insulate the coconspirators' true identities.

Overt Acts of the Conspiracy

In furtherance of the conspiracy, SEAN WILLIAM DOAK, JAMES GREGORY CAMERON, COLIN HUGH MARTIN, ADAM CHRISTIAN J. SERRANO and others, known and unknown, performed one or more of the following overt acts, including but not limited to:

1. COLIN HUGH MARTIN and others, using the company name Gorge Timber Corporation, purchased a helicopter from a Texas company for \$900,000 and sent a pilot

1 to take delivery of the helicopter in Texas. In November 2007, the pilot flew the
2 helicopter to the residence of HUGH COLIN MARTIN and Jennifer Cahill in Malakwa,
3 British Columbia, Canada.

4 2. During January 2008, JAMES GREGORY CAMERON and ADAM
5 CHRISTIAN J. SERRANO communicated, using Blackberry devices, about a possible
6 sale of thousands of MDMA pills.

7 3. During January and February 2008, JAMES GREGORY CAMERON explained
8 to a prospective customer that the men who made the decisions about the drugs sale were
9 two brothers, one of whom was then in prison.

10 4. On January 14, 2008, ADAM CHRISTIAN J. SERRANO talked about his
11 ability to deliver thousands of MDMA pills at a time, to deliver British Columbia
12 marijuana in the United States, and said that he and his coconspirators paid \$14,000 per
13 kilogram for cocaine which they smuggled to Canada on a weekly basis. SERRANO
14 estimated that he and his coconspirators smuggled up to 300 kilograms of cocaine a week
15 from the United States into Canada.

16 5. On February 1, 2008, Jennifer Cahill, as president of Gorge Timber
17 Corporation, signed an agreement leasing a Eurocopter 120 helicopter, tail identifier
18 C-GOCA, through March 31, 2009 after COLIN HUGH MARTIN negotiated the lease.

19 6. On or about March 5, 2008, coconspirators, including Samuel Lindsay-Brown,
20 loaded a helicopter in Canada with approximately 200,000 MDMA pills. A coconspirator
21 flew the helicopter into Washington State and delivered the MDMA pills.

22 7. On March 6, 2008, two coconspirators, Wayne Coates and Lucretia James,
23 possessed the approximately 200,000 MDMA pills in Tukwila, Washington, prior to an
24 attempt to distribution the pills to another.

25 8. On March 8, 2008, coconspirators possessed a shipment of cocaine in the
26 Southwestern United States. One coconspirator, Lucretia James, began driving to
27 Washington State with 72 kilograms of the cocaine, until her car was stopped in Northern
28 California and the cocaine was seized by law enforcement.

1 9. Between June 2008 and January 2009, Samuel Lindsay-Brown flew helicopter
2 loads of marijuana for COLIN HUGH MARTIN into the United States. Lindsay-Brown
3 flew the Eurocopter 120, C-GOCA, leased by Gorge Timber Corporation, with these
4 loads.

5 10. In January 2009, COLIN HUGH MARTIN and Jennifer Cahill returned the
6 Eurocopter 120, C-GOCA, to its owner as the owner's request.

7 11. On January 30, 2009, Jennifer Cahill, as president of Gorge Timber
8 Corporation signed an agreement leasing Bell Helicopter 206, tail identification C-
9 GUCX, from Eagle Copters of Calgary, Canada.

10 12. On February 21, 2009, two coconspirators, Ross Legge and Leonard Ferris,
11 drove a car in Utah on their way to deliver cocaine to a helicopter in Washington State.
12 They possessed 83 kilograms of cocaine, intended for distribution in Canada. Legge and
13 Ferris were stopped by a Utah State Patrol Trooper and the cocaine was seized.

14 13. Between February 21 and February 23, 2009, SEAN WILLIAM DOAK sent
15 and received Blackberry messages confirming anticipated upcoming exchanges of
16 cocaine and marijuana.

17 14. On February 23, 2009, Samuel Lindsay-Brown flew from Canada into
18 northeastern Washington State on the Bell Helicopter 206, C-GUCX. He carried a load
19 of 420 pounds of marijuana to deliver and intended to pick up the 83 kilograms cocaine
20 which had been seized. Samuel Lindsay-Brown was arrested.

21 15. Following Lindsay-Brown's arrest, COLIN HUGH MARTIN sent Blackberry
22 messages to coconspirators inquiring about the whereabouts of Samuel Lindsay-Brown
23 and asking whether Lindsay-Brown had been arrested.

24 16. On February 24, 2009, SEAN WILLIAM DOAK sent a Blackberry message
25 urging the coconspirators to work together "as a team" since COLIN HUGH MARTIN
26 "not only lost machine and captain" but that MARTIN might also be responsible for
27 paying for the load since the loss was a result of "error on the operator." SEAN
28 WILLIAM DOAK estimated the load as being worth four or five million (Canadian)

1 dollars, said that he could not have one coconspirator "take the whole hit," and said that
2 MARTIN "will be lucky if he is not dead" [for losing the load].

3 17. On February 24, 2009, ADAM CHRISTIAN J. SERRANO sent Blackberry
4 messages discussing another drug load, suggesting the use of satellite telephones since the
5 Blackberries may have been compromised, and establishing a new code for transmitting
6 GPS coordinates. He sent additional Blackberry messages confirming the use of a
7 previously-used landing site in Idaho for the next drug exchange, asking that
8 coconspirators use a Garmin GPS system, and arranging for sufficient aviation fuel for
9 the helicopter.

10 18. On February 25, 2009, HUGH COLIN MARTIN called the Drug Enforcement
11 Administration in Spokane, Washington, identified himself as the owner of Gorge Timber
12 Corporation, and requested the return of the Bell 206 helicopter, C-GUCX, helicopter.

13 19. On February 26, 2009, ADAM CHRISTIAN J. SERRANO sent Blackberry
14 messages to coconspirators saying he had 140 kilograms of cocaine in the Los Angeles
15 area which needed to be picked up and asking if anyone was available to help.

16 20. On February 28, 2009, a coconspirator possessed a partial cocaine shipment,
17 of only 20 kilograms, in the Los Angeles area which he delivered to another. The partial
18 shipment, which was seized by law enforcement, was destined for loading on the
19 helicopter in Northern Idaho and eventual transport into Canada.

20 21. On March 5, 2009, coconspirator Joseph Patrick Curry loaded approximately
21 175 pounds of marijuana on a helicopter, a Robinson R22, tail identification C-GBCG
22 which was owned by Krista Francine Berry, his companion and cohabitant. Coconspirator
23 Joseph Patrick Curry also hid another approximately 150 pounds of marijuana and
24 40,000 MDMA pills for transport on the next flight into Idaho in the snow at the
25 helicopter's Canadian loading site.

26 22. On March 5, 2009, coconspirator Jeremy Snow piloted the Robinson R22, tail
27 identification C-GBCG, from Canada into Northern Idaho. That day, Snow intended to
28

1 deliver approximately 325 pounds of marijuana as well as approximately 40,000 MDMA
2 pills and to pick up the 20 kilograms of cocaine which had been seized.

3 23. In September 2009, COLIN HUGH MARTIN called the Drug Enforcement
4 Administration office in Vancouver, British Columbia, identifying himself by name and
5 offering to provide ongoing information regarding drug trafficking into the United States

6 24. In October and November, 2009, COLIN HUGH MARTIN communicated
7 with a person in the United States, claiming to have the "ability to control 70% of the
8 work that comes out of BC and what comes into BC" [referencing marijuana leaving
9 British Columbia and cocaine being exported into British Columbia], explaining that he
10 "had a long history of credibility" in the drug business which he had been in "for most of
11 my adult life," and offering to assist law enforcement. MARTIN explained that he could
12 identify other coconspirators and direct law enforcement to drug loads so long as he was
13 allowed to continue his drug business for ten years and was assured that law enforcement
14 would arrest only other people.

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2 It is further alleged that this offense involves 1,000 kilograms or more of a mixture
3 or substance containing a detectable amount of marijuana.

4 It is further alleged that this offense involves five kilograms or more of a mixture
5 or substance containing a detectable amount of cocaine.

6 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)
7 and Section 846.


8 A TRUE BILL:

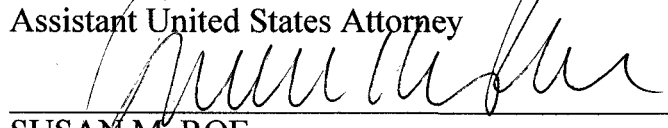
9 DATED: December 22 2009

10 Signature of Foreman Redacted
11 Pursuant to Ninth Circuit Judicial Policy

12 FOREPERSON

13 
14 JENNY A. DURKAN
15 United States Attorney

16 
17 DOUGLAS B. WHALLEY
18 Assistant United States Attorney

19 
20 SUSAN M. ROE
21 Assistant United States Attorney